IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

The STATE of TEXAS, et al.,

Plaintiffs,

v.

Civil Action No. 3:22-cv-00780-M

JOSEPH R. BIDEN JR., in his official capacity as President of the United States, *et al.*,

Defendants.

JOINT STATUS REPORT REGARDING JURISDICTIONAL DISCOVERY

Pursuant to the Court's Order of August 22, 2022, ECF No. 50, the parties jointly provide the Court with an update on the status of jurisdictional discovery.

Since the last update to the Court, the parties have further conferred with each other on the type and scope of discovery to be served. Defendant-Intervenors have indicated that they will be formally joining the Government's discovery requests. The parties are currently discussing the possibility of narrowing the issues upon which discovery would be necessary via stipulation. The parties anticipate engaging in further dialogue on these requests over the coming weeks.

In light of this activity, the parties respectfully request that the Court continue the stay governing this matter and continue to hold all pending deadlines in abeyance. The parties will file a joint status report providing a further update on the progress of jurisdictional discovery on or by December 15, 2022.

Dated: November 15, 2022 Respectfully submitted,

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Certificate of Service

On November 15, 2022, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Joseph A. Darrow
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